

AMY L. BOMSE (No. 218669)
SHARON D. MAYO (No. 150469)
JEE YOUNG YOU (No. 241658)
ARNOLD & PORTER KAYE SCHOLER LLP
Three Embarcadero Center, 10th Floor
San Francisco, California 94111-4024
Telephone: (415) 471-3100
Facsimile: (415) 471-3400
Email: amy.bomse@aporter.com
sharon.mayo@aporter.com
jeeyoung.you@aporter.com

BETH H. PARKER (No. 104773)
PLANNED PARENTHOOD NORTHERN
CALIFORNIA
2185 Pacheco Street
Concord, California 94520
Telephone: (925) 887-5366
Email: beth.parker@ppacca.org

Attorneys for Plaintiffs

HELENE T. KRASNOFF (*pro hac vice*)
PLANNED PARENTHOOD FEDERATION OF
AMERICA
1110 Vermont Avenue, NW, Suite 300
Washington, DC 20005-6300
Telephone: (202) 973-4800
Email: helene.krasnoff@ppfa.org

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PLANNED PARENTHOOD FEDERATION OF AMERICA, INC.; PLANNED PARENTHOOD: SHASTA-DIABLO, INC. dba PLANNED PARENTHOOD NORTHERN CALIFORNIA; PLANNED PARENTHOOD MAR MONTE, INC.; PLANNED PARENTHOOD OF THE PACIFIC SOUTHWEST; PLANNED PARENTHOOD LOS ANGELES; PLANNED PARENTHOOD/ORANGE AND SAN BERNARDINO COUNTIES, INC.; PLANNED PARENTHOOD OF SANTA BARBARA, VENTURA AND SAN LUIS OBISPO COUNTIES, INC; PLANNED PARENTHOOD PASADENA AND SAN GABRIEL VALLEY, INC.; PLANNED PARENTHOOD OF THE ROCKY MOUNTAINS; PLANNED PARENTHOOD GULF COAST; AND PLANNED PARENTHOOD CENTER FOR CHOICE;

Plaintiffs,

CENTER FOR MEDICAL PROGRESS; BIOMAX PROCUREMENT SERVICES, LLC; DAVID DALEIDEN (aka "ROBERT SARKIS"); TROY NEWMAN; ALBIN RHOMBERG; PHIL CRONIN; SANDRA SUSAN MERRITT (aka "SUSAN TENNENBAUM"); GERARDO ADRIAN LOPEZ; and UNKNOWN CO-CONSPIRATORS, inclusive.

Defendants.

Case No. 3:16-cv-00236-WHO

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR
PLAINTIFFS TO SUBMIT
MATERIALS IN CAMERA**

Judge: Hon. Donna M. Ryu

STIPULATION AND [PROPOSED] ORDER

2 Plaintiffs Planned Parenthood Federation of America, Inc.; Planned Parenthood: Shasta-
3 Diablo, Inc. dba Planned Parenthood Northern California; Planned Parenthood Mar Monte, Inc.;
4 Planned Parenthood of the Pacific Southwest; Planned Parenthood Los Angeles; Planned
5 Parenthood/Orange and San Bernardino Counties, Inc.; Planned Parenthood of Santa Barbara,
6 Ventura and San Luis Obispo Counties, Inc.; Planned Parenthood Pasadena and San Gabriel
7 Valley, Inc.; Planned Parenthood of the Rocky Mountains; Planned Parenthood Gulf Coast; and
8 Planned Parenthood Center for Choice (“Plaintiffs”) and Defendants Center for Medical Progress
9 (“CMP”); BioMax Procurement Services, LLC (“BioMax”); David Daleiden; Adrian Lopez;
10 Albin Rhomberg (“Defendants”) (collectively the “Parties”) by and through their counsel, stipulate
11 as follows:

12 WHEREAS, on September 4, 2018, the Parties filed a joint letter concerning, in part,
13 Plaintiffs' redactions for security (Dkt. No. 312);

14 WHEREAS, the Parties lodged certain discovery materials with the Court;

15 WHEREAS, among the materials lodged was Exhibit C, which consisted of thirteen (13)
16 documents produced in the above-captioned matter by Plaintiffs with redactions that are marked
17 "Redaction for Security";

18 WHEREAS, the Court set this issue for hearing on October 11, 2018;

19 WHEREAS, Plaintiffs wish to submit the redacted materials in an unredacted condition so
20 that the Court can review the contents of the redacted material;

21 WHEREAS, Defendants do not object to such submission.

22 Therefore, IT IS HEREBY STIPULATED AND AGREED, and for good cause shown;

23 1. Plaintiffs may submit the documents attached to Docket 312, Exhibit C in
24 unredacted form.

1 Dated: October 9, 2018

Respectfully submitted,

2 **ARNOLD & PORTER LLP**

3 By: /s/ Amy L. Bomse
4 Amy L. Bomse

5 Attorneys for Plaintiffs

6 Dated: October 9, 2018

FREEDOM OF CONSCIENCE DEFENSE FUND

7 By: /s/ Jeffrey M. Trissell
8 Jeffrey M. Trissell

9 Attorneys for Defendants
10 Gerardo Adrian Lopez, Center for Medical Progress &
11 BioMax Procurement Services, LLC

12 Dated: October 9, 2018

LIFE LEGAL DEFENSE FOUNDATION

13 By: /s/ Mike Millen
14 Mike Millen

15 Attorney for Defendant
16 Albin Rhomberg

17

18

19

20

21

22

23

24

25

26

27

28

ATTESTATION

Pursuant to Local Rule 5-1, I, Amy L. Bomse, attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

/s/ Amy L. Bomse
AMY L. BOMSE

[PROPOSED] ORDER

IT IS HEREBY ORDERED that:

1. Plaintiffs may submit the documents attached to Docket 312, Exhibit C in unredacted form.

DATED:

The Hon. Donna M. Ryu
United States Magistrate Judge

PROOF OF SERVICE

I, Georgie M. Price, declare:

I am a resident of the State of California and over the age of eighteen years and not a party to the within-entitled action; my business address is Three Embarcadero Center, Tenth Floor, San Francisco, California 94111-4024. On October 9, 2018, I served the following document(s) described as:

**JOINT STIPULATION AND [PROPOSED] ORDER FOR PLAINTIFFS TO
SUBMIT MATERIALS *IN CAMERA***

- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed as set forth on the attached **SERVICE LIST**.
- by transmitting via email the document(s) listed above to the email address(es) set forth below on this date before 5:00 p.m.
- BY ELECTRONIC FILING/SERVICE; I caused such document(s) to be Electronically Filed/and or Served using the ECF/CM System for filing and transmittal of the above documents to all ECF/CM registrants.
- by placing the document(s) listed above in a sealed Federal Express envelope and affixing a pre-paid air bill, addressed as set forth on the attached **SERVICE LIST**, and causing the envelope to be delivered to a Federal Express agent for delivery.
- by placing them in an envelope or package addressed to the persons at the address(es) below and providing them to a professional messenger service for personal service.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Dated: October 9, 2018

Georgie M. Price
Georgie M. Price